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New York, NY 10175

February 12, 2024

**Via ECF**

Hon. Judge Philip M. Halpern  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601

Application granted.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'PHM', written over a horizontal line.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 13, 2024

**Re: United States v. Christopher Erskine**  
20 cr 626 (PMH)

Dear Judge Halpern:

On February 8, 2024, Your Honor appointed me pursuant to CJA to represent Christopher Erskine on the above-captioned matter.

I am respectfully writing to request that the Court permit the appointment of Michael Perkins, Esq. as associate CJA counsel for Mr. Erskine's case at an hourly rate of \$110, with approval of 100 hours. Mr. Perkins is an associate attorney at my firm who has previously been assigned as associate counsel on cases in the Southern District of New York and in the U.S. Court of Appeals for the Second Circuit.

Based on the February 8, 2024 conference, it is my understanding that it is Your Honor's preference that the sentencing on Mr. Erskine's matter proceed as scheduled on May 23, 2024. Between now and May 23, 2024, work on Mr. Erskine's case will involve review of the trial transcript along with hundreds of exhibits, research and drafting of Rule 29 and Rule 33 motions, visits with Mr. Erskine at MDC, preparation of the objections to the Pre-Sentence Investigation Report and draft of the Defense sentencing submission. Even with the most diligent efforts, I would be unable to timely complete all this work without a second counsel on the matter.

Mr. Perkins' appointment would have the benefit of both timely completion of the work on Mr. Erskine's case ahead of the May 23, 2024 sentencing as well as the conservation of CJA funds and resources by virtue of Mr. Perkins' reduced billing rate. Thank you for your consideration in this matter and I am happy to provide more information upon the Court's request.

Respectfully Submitted,

s/ Elena Fast

Elena Fast, Esq.

Counsel for Christopher Erskine

cc: All counsel (via ECF)